

DECLARATION OF DENISE ACEVEDO PEREZ

I, Denise Acevedo Perez, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a practicing attorney licensed to practice before the States of Massachusetts and Rhode Island. My business address is 1395 Atwood Avenue, Suite 206, Johnston, RI. I am the founding Attorney of the Rhode Island Immigration and Family Law Group since August 2021. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I have practiced immigration law since 2015 representing dozens of noncitizens in removal proceedings before the Executive Office for Immigration Review (EOIR) and federal courts and/or with applications and petitions for immigration benefits or relief filed with U.S. Citizenship and Immigration Services (USCIS).
3. I represent and have represented individuals with both final removal orders in removal proceedings pursuant to 8 U.S.C. § 1229a (Section 240 proceedings); and final removal orders issued by the Department of Homeland Security (DHS) pursuant to 8 U.S.C. § 1231(a)(5) (reinstatement orders).
4. I represent S.M., a 57-year-old native of Laos. S.M. is married to a United States citizen and has a child who is also a United States citizen. S.M. is currently in DHS custody. S.M. has a 1998 final order of removal from removal proceedings. DHS was unable to deport S.M. to Laos. DHS permitted S.M. to continue living and working in the United States.
5. S.M. is currently detained in a detention facility in Florida; S.M. was detained when returning from a family trip to a United States territory in February 2025. I have been communicating with S.M. through the spouse. DHS has not authorized attorney phone calls despite S.M.'s official request to add me to the call list and my submission of an executed Notice of Entry of Appearance as Attorney (Form G-28) to the DHS case manager. DHS asked S.M. which country S.M. would like to be removed to, S.M. has requested to remain in the United States. DHS has not provided S.M. with any information about the country or countries DHS is pursuing for deportation. S.M. is afraid of not knowing this information, including because S.M. fears being deported to many countries in Central America and of being detained in those countries, as had been widely reported.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed this 20th of March 2025 at Johnston, Rhode Island.



Denise Acevedo Perez